

United States District Court
District of Massachusetts

Michelle M. Torrey)	November 1, 2024
Plaintiff)	
V.)	Civil Action No:
FBI, United States of)	
America et al;)	24-10864
Defendants)	

IN CLERK'S OFFICE
FILED
2024 NOV - 1 PM 3:
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Motion for Leave of Amended Complaint
and Request for Jury Trial

The Plaintiff Michelle Torrey requests that amended complaint Doc. No. 10 replace Amended Complaint Doc. No. 9. Ms. Torrey filed Amended Complaint Doc. No 9 on July 15, 2024 and asked for more time to complete the complaint as Plaintiff is not a lawyer and Order gave only 30 days to prepare or risk action dismissal. She requested at least 7 days to complete and filed July 24, 2024. I did not know as I am not a lawyer that proper way to file is with a Motion to leave. I am making this request as the case law and counts were not complete in July 15, 2024 filing and did not have correct spelling of Name of one of named defendants. It is crucial to have 2nd July 24, 2024 complaint as the driving complaint

As the July 15, 2024 complaint was incomplete. I will wait for Honorable Young's ruling on this matter to complete service to the defendants by U.S. Marshall's office. It is critical that Kaitlynn O'ddonell be party to suit as she led me to believe she was investigating my claim of theft and fraud by named defendants. I was denied my right to file a police report based on her conversation presumably with Chief of Police in Brockton whom made the judgement that my money was not stolen but seized. Even after I further explained she still referred my request of investigation to Kaitlynn O'ddonell whom I spoke to and she said, "She was calling FBI to inquire and investigate my claim." Qualified Ammunity is not available to cloak Ms. O'ddenell as Ms. Torrey the Petitioner, innocent owner, has been prejudiced and severely harmed and may only have recourse by having her to answer for her actions that have caused loss of income, 28,600.⁰⁰ plus penalties and interest, caused more health issues, ect. Ms. O'ddonell's lack of care to perform a simple hearing to return innocent owners money has caused great harm.

Respectfully Submitted

Michelle M. Torrey Nov 1, 2024
 Michelle M. Torrey Date
 signed under pains and
 penalties of perjury.